## Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton
Executive Director

Southern District of New York Jennifer L. Brown Attorney-in-Charge

April 17, 2021

## BY ECF

Honorable Naomi Reice Buchwald United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007

Re: <u>United States v. Miguel Angel Martinez</u>

19 Cr. 681 (NRB)

Dear Judge Buchwald:

I write, with the consent of the government, to request a 30 day adjournment of the status conference in the above referenced matter currently scheduled for April 28, 2021. Within the last week, following ongoing plea discussions, the government conferred an amended plea offer to Mr. Martinez. As a result, additional time is required to discuss that offer with Mr. Martinez and prepare for an anticipated change of plea hearing.

Mr. Martinez consents to the exclusion of time under the Speedy Trial Act.

Application granted. The status conference is adjourned until May 27, 2021 at 11:00 a.m. The Court excludes time under the Speedy Trial Act through that date. See 18 U.S.C. § 3161(h)(7)(A). SO ORDERED.

/s/ Amy Gallicchio

Respectfully submitted,

737 Timy Gameento

Amy Gallicchio Assistant Federal Defender O: 212-417-8728

M: 917-612-3274

Cc: AUSA Emily Johnson

NAOMI KEICE BUCHWALD UNITED STATES DISTRICT JUDGE

Dated: New York, New York

April 19, 2021